

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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| In Re:                                   | ) | <b>Chapter 11</b>                                     |
|  | ) |   |
| W. R. Grace & Co., et al. <sup>1</sup> , | ) | <b>Case No. 01-01139 (JKF)</b>                        |
|  | ) | <b>Jointly Administered</b>                           |
| Debtors.                                 | ) |   |
|  | ) | <b>Objection Deadline: December 2, 2005</b>           |
|  | ) | <b>Hearing Date: December 19, 2005 @ 12:00 PM EST</b> |
|  | ) |   |

TO: MEMBERS ON THE COURT'S 2002(i) SERVICE LIST

**NOTICE OF MOTION FOR CLASS CERTIFICATION**

PLEASE TAKE NOTICE that on October 21, 2005, Anderson Memorial Hospital filed the attached motion for class certification pursuant to Rules 9014 and 7023, Fed. R. Bankr. P., seeking to certify a class of property damage claims on behalf of property owners whose buildings were, are or will be contaminated with asbestos fibers released from

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Ins., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgracc, Inc., Coalgracc II, Ins., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp, Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B 11 Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Ins., MICA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Curving, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

asbestos-containing surfacing materials for which the Debtors are legally responsible (the "Motion").<sup>2</sup> The class would explicitly exclude any building for which a property damage claim has already been filed in this bankruptcy.

PLEASE TAKE FURTHER NOTICE that objections to this motion shall be filed and served by **December 2, 2005** in accordance with this Court's Amended Case Management Order, dated February 8, 2005.

PLEASE TAKE FURTHER NOTICE that objections must be served in accordance with Del. Bankr. LR 2002-1.

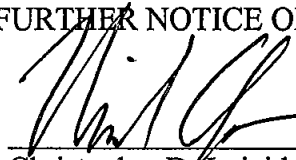
PLEASE TAKE FURTHER NOTICE THAT, ONLY IF AN OBJECTION IS TIMELY FILED AND SERVED, A HEARING ON THE MOTION WILL BE HELD AT ON **DECEMBER 19, 2005 AT 12:00 P.M. E.S.T.** BEFORE THE HONORABLE JUDITH K. FITZGERALD, UNITED STATES BANKRUPTCY COURT, 5490 USX TOWER, PITTSBURGH, PENNSYLVANIA, 15219.

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<sup>2</sup> PLEASE NOTE that due to the extremely voluminous exhibits to the Motion, the Petitioners are serving the exhibits to the Motion only upon counsel to the Debtors, counsel to official committees, the Office of the United States Trustee and certain other parties in interest. Petitioners will provide copies of the exhibits to the Motion to any other party in interest on request.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO OBJECT IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 21, 2005



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Christopher D. Loizides (#3968)  
Michael J. Joyce (#4563)  
Legal Arts Bldg.  
1225 King Street, Suite 800  
Wilmington, DE 19801  
Telephone: (302) 654-0248  
Facsimile: (302) 654-0728 (fax)  
E-mail: [loizides@loizides.com](mailto:loizides@loizides.com)

SPEIGHTS & RUNYAN  
Daniel A. Speights (SC Fed. ID No. 4252)  
Marion C. Fairey, Jr. (SC Fed. ID No. 6101)  
200 Jackson Avenue, East  
P.O. Box 685  
Hampton, SC 29924  
Telephone: (803) 943-4444  
Facsimile: (803) 943-4599